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June 11, 2012

Honorable Sandra L. Townes
United States District Court
Eastern District of New York
225 Cadman Plaza West
Brooklyn, New York 11201

Re: USA v. James Bergen, et al
Criminal Docket No. 11-413 (SLT)

Your Honor:

The undersigned represents James Bergen in the above captioned matter presently pending before you.

This is to respectfully request that Mr. Bergen's bond conditions be modified to the extent that he be given permission to go away on vacation from July 21 through July 29, 2012. This trip is to the Lake George region of New York State where Mr. Bergen and his wife plan to stay with friends who own a home in the area at 156 Hilltop Road, Chestertown, New York 12817.

This matter has already been discussed in detail with the assigned AUSA, as well as with Mr. Bergen's pre-trial services officer. There is no objection and both have expressed consent to defendant's request. Mr. Bergen remains in full compliance with all other bond conditions. Of course, a full itinerary, including the names of his travel companions, and complete trip details are available upon your request.

Lastly, Mr. Bergen respectfully requests that the court also consider allowing him to travel throughout New York State, without restriction, and without prior approval. Please advise what further information the court would require to assist in deciding on this matter.

Thank you for your courtesy and consideration.

Very truly yours,

Leo V. Duval (2918)